

EXHIBIT # A

From: Tyrone Blackburn tb.ackburn@tab.ackburn.law.com
Subject: Motion to file a sur-reply
Date: Apr 18, 2022 at 7:33 AM
To: Judd Burstein jburstein@bur.law.com

Judd,

This evening I will submit a letter to the court to request leave to file a Sur-reply to your reply brief for your sanctions motion. In your reply brief, you introduced new and demonstrably false Declarations that require a response.

In your reply brief, you provided the court with declarations from Steven Gordon, and "Mrs. Gordon." Although there were several issues with the Mrs. Gordon declaration, for the purposes of this email I will focus on three issues. 1. Ciardone Franklin sent me a text message letting me know that Steven Gordon had threatened her in exchange for her providing him with a written statement. I am unsure if you were made aware of this, but nonetheless, I have attached a screenshot of the text message I received from Ciardone concerning this fact. 2. On March 31, 2022, Ciardone was my date to a Gala in NYC. She did not express any "anger" regarding my declaration, and what she shared with me regarding Mr. Gordon's drug addiction. So, Mr. Gordon's assertion in the March 30th email to you that his wife was "angry," is a lie. 3. Ciardone Franklin is a licensed attorney, and her mother Allyson Franklin is a licensed attorney. It is highly unlikely that Ciardone, with the advice of her mother, would provide a demonstrably false declaration to a Federal Court concerning facts that I can confirm by reproducing the two-hour-long conversation.



I have no desire to disclose the contents of Ciardone and my conversation. But it is important to correct the record especially if Steven fabricated the "Mrs. Gordon" declaration (which I think he did since he fabricated the youtube post).

I am requesting that you withdraw Steven Gordon and the Mrs. Gordon's Declarations or provide me with dates for a briefing schedule so I can file a sur-reply.

Regards,

Tyrone A. Blackburn, Esq.
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Wednesday 6:30 PM

I've been crying all day, I'm so stressed. Steve is threatening to use what you wrote in the declaration against me in the divorce to get money from me. Can you please give me a call so we can come up with a plan. Judd is filing soon.